

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Conditional Major Draft – No. F-03-009

Crane Plumbing LLC

2780 S. Hwy. 1247

Somerset, KY 42501

April 23, 2003

Andrea Riegler, Reviewer

PLANT I.D. # 21-199-00043

APPLICATION LOG # 54815

SOURCE DESCRIPTION:

Crane Plumbing LLC is an existing source located in Somerset, KY. This facility fabricates office partitions. The plant consists of one manual paint booth, one automatic paint booth, one partition fabrication line, one welding line (including spot welding and plasma torch cutting) and process heaters.

COMMENTS:

The Permit Review Branch received a permit renewal application on July 16, 2002 from Crane Plumbing LLC. The application requested a change in some of the monitoring requirements. In the previous permit, EPA Reference Method 24 was required to determine the HAPs and VOC content of both paints and solvents used in the process. According to documents in the application and after discussion with the field office, it has been determined that MSDS will suffice to determine HAPs and VOC content of both paints and solvents. The facility will continue to monitor paint and solvent usage and submit semi-annual HAP reports.

APPLICABLE REGULATIONS:

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|----------------------------|--|
| 1. Manual Paint Booth | 401 KAR 59:010, New process operations
401 KAR 63:020, Potentially hazardous matter or toxic substances |
| 2. Automatic Paint Booth | 401 KAR 59:010, New process operations
401 KAR 63:020, Potentially hazardous matter or toxic substances |
| 3. Partition Manufacturing | 401 KAR 59:010, New process operations |
| 4. Welding Line | 401 KAR 59:010, New process operations |
| 5. Process Heat | None |

EMISSION AND OPERATING CAPS DESCRIPTION:

1. Volatile organic compound (VOC) emissions shall not exceed 95 tons per year based on a 12 month rolling total for the entire source to preclude a major source Title V review.

2. Hazardous air pollutants (HAPS) emissions shall not exceed 9.5 tons per year individually and 22.5 tons per year combined based on a rolling 12-month rolling total for the entire source to preclude a major source Title V review.

PERIODIC MONITORING:

Weekly observations of emissions and an annual EPA Reference Method 9 for EPs 1, 2, and 3 shall be performed. EPs 4 and 5 will submit to annual EPA Reference Method 9 monitoring.

CREDIBLE EVIDENCE:

This permit contains provisions that require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations